

1 **HONE LAW**

2 Eric D. Hone, NV Bar No. 8499  
3 ehone@hone.law  
4 Joel Z. Schwarz, NV Bar No. 9181  
5 jschwarz@hone.law  
6 701 N. Green Valley Parkway, Suite 200  
7 Henderson, NV 89074  
8 Phone: 702-608-3720  
9 Fax: 702-703-1063

10 **O'MELVENY & MYERS LLP**

11 Molly M. Lens, Esq. (*pro hac vice*)  
12 mlens@omm.com  
13 1999 Avenue of the Stars, 8th Floor  
14 Los Angeles, CA 90067  
15 Phone 310-246-8593

16 Attorneys for Defendants FREMANTLE  
17 PRODUCTIONS NORTH AMERICA, INC. and  
18 MARATHON PRODUCTIONS, INC.

19 **UNITED STATES DISTRICT COURT**

20 **DISTRICT OF NEVADA**

21 RUSSELL G. GREER,

22 Plaintiff,

23 v.

24 FREMANTLE PRODUCTIONS NORTH  
25 AMERICA, INC, a corporation and  
26 MARATHON PRODUCTIONS, INC, a  
27 corporation,

28 Defendants.

Case No. 2:21-cv-01905-RFB-NJK

Judge Richard F. Boulware, II

Magistrate Judge Nancy J. Koppe

**JOINT STIPULATION AND  
[PROPOSED] ORDER TO STAY  
DISCOVERY [ECF NO. 49]**

1 Plaintiff Russell G. Greer (“Greer”), in pro per person, and Defendants Fremantle  
2 Productions North America, Inc. and Marathon Productions, Inc. (collectively, “Marathon”), by  
3 and through counsel, hereby agree and stipulate as follows:

4 WHEREAS, Marathon moved to compel arbitration on February 4, 2022, *see* ECF No.  
5 31;

6 WHEREAS, Marathon’s Motion to Compel Arbitration is currently under submission;

7 WHEREAS, on April 7, 2022, the Court directed Marathon to seek a stay of discovery by  
8 April 14, 2022 or, in the alternative, instructed the Parties to file a joint proposed discovery plan  
9 by April 21, 2022, *see* Order, ECF No. 49;

10 WHEREAS, the Parties agree that—for party and judicial efficiency—the Court should  
11 resolve Marathon’s Motion to Compel Arbitration before the Parties file a joint proposed  
12 discovery plan or otherwise commence discovery;

13 WHEREAS, the Parties agree that should the Court deny Marathon’s Motion to Compel  
14 Arbitration, the Parties shall have at least one week from such ruling to file a joint proposed  
15 discovery plan;

16 WHEREAS, the Parties otherwise reserve all rights.

17 Dated this 8th day of April 2022.

18 RUSSELL G. GREER

19 /s/ Russell G. Greer  
20 Russell G. Greer  
russmark@gmail.com  
P.O. Box 46602  
21 Las Vegas, NV 89114  
Phone 801-895-3501

22 *Pro Se Litigant*

23 Dated this 8th day of April 2022.

24 O’MELVENY & MYERS LLP

25 /s/ Molly M. Lens  
26 Molly M. Lens (*pro hac vice*)  
mlens@omm.com  
1999 Avenue of the Stars, 8th Floor  
27 Los Angeles, CA 90067  
Phone: (310) 553-6700

28 *Attorneys for Defendants*

24 IT IS SO ORDERED:

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26 

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UNITED STATES DISTRICT JUDGE

27 Dated: \_\_\_\_\_

28 JOINT STIPULATION & [PROPOSED]  
ORDER TO STAY DISCOVERY  
CASE NO. 2:21-cv-01905